

Docket No. 99D-4488 and 99D-4489

FDA  
Dockets Management Branch (HFA - 305),  
5630 Fishers Lane, rm. 1061  
Rockville, MD 20852

I find it outrageous that you are continuing to demand that sprout growers solve the problem of seed safety instead of putting that responsibility on the seed producers.

The FDA should establish guidelines for the production of seed for human consumption. The FDA, USDA or other applicable agency should certify the seed produced by farmers as is done with meat (i.e. Grade A).

Sprout growers will need to buy only certified (for human consumption) seed and must be able to produce proof of certification upon demand.

As you likely know the only currently safe source of seed is that which is Certified Organic. The FDA should contract the advice and help of certified organic seed farmers to establish methods which will make the conventional farming (non-organic) of seed for human consumption as safe as the certified organic method.

The FDA should add to the Guidance a clause which states that "Certified Organic seed is considered an acceptable alternative approach to prevention of microbial hazards in sprouted seeds."

It is ridiculous to demand that all sprout growers have an in-house lab and that they use toxic levels of bleach (which is a known carcinogen and obviously a terrible pollutant). Most sprout growers can not afford labs (and would therefore be forced to cease operations) and many - hopefully - know that the dumping of bleach in the name of producing a health food is absurd (especially at the levels currently used and suggested in the Guidance).

Sincerely,

*Carol Wilson and Robert Miller*

Submit written comments by December 13, 1999, to ensure adequate consideration in preparation of revised documents, if warranted.

Identify as Docket No. 99D-4488 and 99D-4489

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